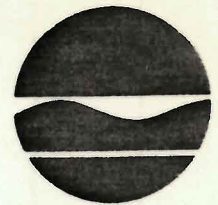


F. Sangone 2F

New York State Department of Environmental Conservation
50 Wolf Road, Albany, New York 12233-0001



Henry G. Williams
Commissioner

APR 17 1986

Mr. John Nichter
Hyde Park Coordinator
Occidental Chemical Corporation
360 Rainbow Boulevard South
Niagara Falls, New York 14303

Dear Mr. Nichter:

RE: Hyde Park Storage and Handling Facility

It is our understanding that the following was agreed to on March 19, 1986 at a meeting among the New York State Department of Environmental Conservation (NYSDEC), United States Environmental Protection Agency (USEPA) and Occidental Chemical Corporation (OCC) at Niagara Falls, New York:

1. All revised drawings, plans and specifications related to the construction of the facility will be submitted by May 1, 1986.
2. The revised operating manual will be submitted around June 1, 1986.
3. The remaining revised documents will be submitted around mid-July. These documents must be submitted prior to EPA/State approval of construction, however, finalization and approval can occur during construction. Operation will not be approved by EPA/State until all documents are finalized and approved.

Included in the May 1 submittal from OCC will be a response to the following comment numbers from the EPA/State letter of February 25, 1986:

B-1, B-2, D-3, D-4, D-5, D-8, D-11, D-12, D-13, F-5, G-1

It is recognized that some of these comments may no longer apply due to the change in the site lay-out which will be submitted on May 1 and it is expected that you will address these in your cover letter for the May 1 submittal.

Mr. John Nichter

Page 2

We have reviewed the requirement for the secondary containment capacity at the Storage and Handling Facility. This capacity, at a minimum, should be at least 110 percent of the largest tank volume or the combined volume of all interconnected tanks. If OCC redesigns the tank piping by providing separate pumps for each tank with no common suction lines between them and no other common line between the tanks, the breakage of which may lead to draining/siphoning of the interconnected tanks, provision of a secondary containment capacity of 110 percent of the largest tank volume will meet State requirements.

If you have any questions, please contact Ms. Deborah L. Aldrich, P.E., at 518-457-4343.

Sincerely,

Joseph L. Alcock /for

Norman H. Nosenchuck, P.E.
Director
Division of Solid and Hazardous Waste
State Hyde Park-Bloody Run Area
Program Coordinator

cc: S. Gianti, USEPA, Region II
A. Goldweber, NYSDOL
W. Walters, USDOJ
A. Wakeman, NYSDOH
F. Langone, USEPA, Region II ✓

*is not
about
any
allowance*